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Texas Department of Water Resources

INTEROFFICE MEMORANDUM

ENFORCEMENT AND
FIELD OPERATIONS

TO : George Green, Chief, Field Support, Enforcement & Field Operations Division

DATE: August 20, 1979

THRU :

MAJOR

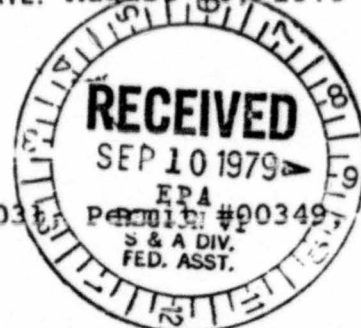
FROM : Paul Kutchinski, Supervisor, District 12

ITS operator 8-734-3011

SUBJECT: PPG Industries, Solid Waste Registration #30036

NPDES Permit TX0004685 (ACTION)

TXD080268170



District 12 personnel made an annual compliance inspection of PPG Industries, Corpus Christi Plant, in June 1979. On July 20, 1979, the inspection was reported on EPA Form 3560-3 and TDWR Form 0263. Remarks on both forms indicated that the inspector was denied information by PPG concerning the effects of chrome seepage.

Subsequent to PPG's receipt of their copy of the inspection report, District 12 received a letter from PPG on the matter. A copy is attached. Shortly thereafter, I was contacted by Hayden Head, Jr., attorney for PPG. Head indicated the company's desire to cooperate, and requested an early meeting between company officials and District 12 representatives.

The meeting was held at the PPG plant on August 17, 1979. Present for all, or a portion, of the meeting were August Meinrath, Works Manager; Richard J. Samelson, Manager, Environmental Programs, PPG (Pittsburgh); C. E. Carter, Plant Technical Superintendent; Hayden Head, Jr., attorney for PPG; Robert Lewis and Paul Kutchinski, TDWR, District 12.

From the beginning of the conference, PPG representatives offered full cooperation, and access to their records concerning the chrome seepages. They had files available at the meeting. C. E. Carter made a presentation on the subject, describing their actions to date and the data they have collected. TDWR representatives requested, and were promised, a copy of a map showing well locations and recent data from well samples.

It is PPG's position that they are aware of the seepage, that it is not having an adverse effect on public surface waters or on usable ground waters, that they have had an intercept system installed which is effectively containing the seepage, and no additional action is necessary.

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PPG Industries, Solid Waste Registration #30031 Permit #00349,
NPDES Permit TX0004085 (ACTION)
August 20, 1979
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As I understand the situation at this time, there are two separate sources of hexavalent chromium which have been seeping into the ground for several years. One source is in plant and the other is from an early chrome waste disposal site near Corpus Christi Inner Harbor. Seepage from both sources moves underground northeast toward Corpus Christi Inner Harbor. The two existing intercept systems are established in the seepage plumes on PPG property near Corpus Christi Inner Harbor south shoreline. PPG monitors certain wells on a quarterly basis.

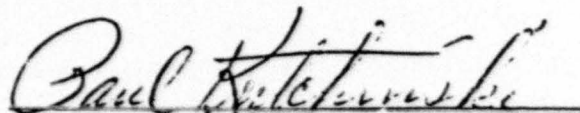
PPG representatives agreed to develop appropriate geological cross-sections, determine the quality of ground water moving onto their property from up dip, and define on a map the areal extent of each of the seepage plumes (with <1.0 ppm Cr^{+6} as peripheral definition).

PPG officials seem most anxious to resolve the matter and to satisfy current TDWR interest. ~~TDWR has been advised by letter that the PPG plant will be sold September 1, 1979 to American Chrome and Chemicals, Inc.~~

Additionally, PPG officials are desirous of getting entries into TDWR and EPA files that they intend to cooperate fully and to provide any pertinent data which is requested. Consequently, I recommend that you provide EPA a copy of this memorandum.

District 12 plans to meet again with PPG representatives, and to conduct such additional data review or field investigations as deemed necessary in order to assure ourselves we have a clear picture of the seepage problems and its environmental significance. I do not have any recommendation for central office action at this time.

PK:cb
Enc.


Paul Kutchinski

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